

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES
(NNA/USPS-T1-1 THROUGH 11 AND 14)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the Newspaper Association of America dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response. Objections to NNA/USPS-T1-12 and 13 were filed on March 2, 2012.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
March 15, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-1

Please refer to your response to GCA/USPS T1-1, where you stated:

“The Critical Entry Times (CETs) for Periodicals Flats were modified to conform the service standard requirement of this mail class with the processing requirements in an Flats Sequencing System (FSS) environment in May of 2011.”

- a. Is the intention to sort Periodicals Flats on FSS machines the sole driving factor in changes in CETs? If not, please list other factors.
- b. Do transportation schedules also affect CETs?
- c. Are you aware of any facilities where newspaper Periodicals or Standard mail is sorted on the FSS machines? If so, please list the facilities.

RESPONSE

- a. Yes.
- b. They may.
- c. I am not.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-2

Has the Postal Service determined that:

- a. Some percentage of intra-SCF First-Class mail from a closing facility will be handled by a hub within a zone of the gaining facility?
- b. Some percentage of intra-SCF Periodicals from a closing facility will be handled by a hub within a zone of the gaining facility?
- c. Some percentage of intra-SCF Standard mail from a closing facility will be handled by a hub within a zone of the gaining facility?

RESPONSE

- a-c. Yes, for the portion of the intra-SCF service area the hub is serving, the exact percentages are unknown.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-3

If your response to any part of NNA/USPS T1-4 is yes, has the Postal Service requested proposals for the operation of hubs:

- a. From private contractors.
- b. From worker groups within USPS.

If a request for proposals has been publicly issued, please provide a copy.

RESPONSE

For purposes of responding to this interrogatory, it is assumed that the intended reference is to interrogatory NNA/USPS-T1-2.

- a. No.
- b. No.

No request for proposals has been issued, but a request for information has.

The following is a link to that request:

https://www.fbo.gov/index?s=opportunity&mode=form&id=1f9cbe54e5322fee312f64780a0367c2&tab=core&_cview=0

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-4

If your response to any part of NNA/USPS T1-4 is yes, has the Postal Service requested proposals for the transportation of mail between hubs or to and from the hubs and the gaining facility.

- a. From private contractors
- b. From worker groups within USPS

If a request for proposals has been publicly issued, please provide a copy.

RESPONSE

See the response to NNA/USPS-T1-3.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-5

If the Postal Service succeeds in creating the types of hubs referred to in the previous questions, will the "Intra-SCF" mail moving through the hubs:

- a. Be carried only if in containers sorted to 5 digit or carrier route; or
- b. Be broken down if some 5 digit or carrier route bundles are presented in containers sorted to the 3 digit or lower schemes.

RESPONSE

Note, the hubs are being established to serve as logistical points for the Postal Service. They may not necessarily serve the entire former intra-SCF mail processing area.

- a. Yes.
- b. This will depend on the characteristics of the mail volume. If this mail volume is capable of being processed on automated equipment, the Postal Service will move this mail volume to the appropriate plant to process on automated equipment.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-6

What type of facility would be required if the Postal Service set up intra-SCF hubs? If any facilities being studied in the AMP process are candidates for housing such a hub, please explain what criteria would be used to determine that the facilities are candidates for use as a hub.

RESPONSE

A facility that has appropriate dock space and workroom floor based on the required square feet to handle the anticipated volume flowing through the facility.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-7

Do you anticipate that Business Mail Entry Units:

- a. will be set up or preserved in existing facilities that are converted to intra-SCF hubs?
- b. will be set up in new facilities that are used as intra-SCF hubs?
- c. may be operated by contractors in the event non-USPS personnel are chosen to operate such hubs?

RESPONSE

- a. Yes.
- b. Potentially.
- c. Potentially.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-8

If intra-SCF hubs are set up to handle some mail, how would you expect CETs to be determined for mailers aiming at a Day Zero entry?

RESPONSE

Based on the transportation schedules and the required entry time in order to make those dispatches would establish the Day Zero entry time.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-9

If you anticipate that a CET in a hub would be set more than an hour earlier than existing in a current entry plant, please explain why you would expect that result?

RESPONSE

There currently is no anticipation of what the CET in a hub would be, they are currently under evaluation.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-10

Has the Postal Service performed any analysis on the volume of First-Class, Periodicals and/or Standard Mail that may be maintained at current service levels if intra-SCF hubs are set up? If so, please provide the results.

RESPONSE

Such analysis has not been performed.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-11

In light of the Postal Service's public announcement on February 23 that determinations had been made on the facilities to be closed, were any announcements made or communications made to mailers in the affected facilities about the Postal Service's deliberations or plans to set up intra-SCF hubs? If so, please provide a copy of any instructions given to postal personnel with regard to such announcements. If not, please explain why not.

RESPONSE

The Postal Service is a very large organization with a lot of customer interface. Accordingly, it is possible that there have been some communications between some postal managers and some mailers on the topic of future intra-SCF hubs since February 23. Based on the various consolidation decisions announced that day, the Postal Service is now evaluating the logistical needs of the SCF service areas created by those decisions. I am informed that we will provide information about intra-SCF hub locations through routine channels after hub location decisions are made.

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL NEWSPAPER ASSOCIATION**

NNA/USPS-T1-14

As you have participated in the analysis that led to the Postal Service's proposal in this docket, have you considered any impact of service changes on Within County Periodicals mail, as opposed to other mail within the Periodicals product group? If so, please describe your conclusions.

RESPONSE

During the development of the proposal, we understood that the diversity of mailers who use each postal product would result in a range of reactions to the prospect of the service changes being contemplated, including Within County publishers who might experience changes in service they deemed adverse and/or different from those of other (including other Periodicals) mailers. That understanding was affirmed by the wide range of comments filed in response to the Advance Notice of Proposed Rulemaking. Our conclusion then was that we should nevertheless proceed in December 2011 with both the rulemaking notice and the request in this docket, and commit ourselves to carefully considering the rulemaking comments we receive before developing a final rule, and also weighing the evidence that emerges in this docket.